

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

UNITED STATES OF AMERICA)

CR. NO. 8:14-655

18 USC § 1344

18 USC § 2

18 USC § 981(a)(1)(C)

28 USC § 2461(c)

v.)

TERESA JANE STANDRIDGE)

TOMMY DALE STANDRIDGE)

CATHY WHITLOCK LOWE)

VERONICA DALE WILLIAMS)

WILLIAM LEE SIMMONS)

KRISTIE LYNN BROCK)

INDICTMENT

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THE GRAND JURY CHARGES THAT:

That from in or about January 2007, and continuing through in or about December 2010, in the District of South Carolina, the Defendants, TERESA JANE STANDRIDGE, TOMMY DALE STANDRIDGE, CATHY WHITLOCK LOWE, VERONICA DALE WILLIAMS, WILLIAM LEE SIMMONS, and KRISTIE LYNN BROCK, did knowingly and willfully execute a scheme and artifice to obtain the monies, funds, credits, assets, securities, and other property owned by, and under the custody and control of, Wells Fargo Bank (formerly Wachovia Bank), a bank whose deposits were then insured by the Federal Deposit Insurance

Corporation, by means of false and fraudulent pretense, representations, and promises.

A. THE SCHEME AND ARTIFICE

1. That during the time frame of this Indictment the Defendants, TERESA JANE STANDRIDGE, CATHY WHITLOCK LOWE, VERONICA DALE WILLIAMS, WILLIAM LEE SIMMONS, and KRISTIE LYNN BROCK, were employees of New Foundations Children and Family Services, Inc., (now known as New Foundations Home for Children, Inc.) hereinafter referred to as New Foundations, located in Anderson, South Carolina;

2. That during the time frame of this Indictment New Foundations did maintain a bank account at Wells Fargo Bank (formerly Wachovia Bank);

3. That as part of her duties at New Foundations, Defendant TERESA JANE STANDRIDGE was responsible for the processing of payroll;

4. That at no time during the time frame of this Indictment did Defendant TERESA JANE STANDRIDGE have the personal authority to grant employees financial bonuses or in any way to supplement their pay.

B. EXECUTION OF THE SCHEME AND ARTIFICE

5. During the existence of the scheme and artifice to defraud, it was the pattern and practice of Defendant TERESA JANE STANDRIDGE to cause extra

funds belonging to New Foundations, and in the care, custody, and control of Wells Fargo Bank (formerly Wachovia Bank) to be transferred from the care, custody, and control of Wells Fargo Bank (formerly Wachovia Bank) to the possession of the following persons:

- A. TERESA JANE STANDRIDGE
- B. TOMMY DALE STANDRIDGE
- C. CATHY WHITLOCK LOWE
- D. VERONICA DALE WILLIAMS
- E. WILLIAM LEE SIMMONS
- F. KRISTIE LYNN BROCK

None of which persons were entitled to receive extra funds from New Foundations, and which funds were transferred to them without the knowledge or authorization of New Foundations.

6. Such pattern and practice involved the following steps from in or about January 2007 and continuing through in or about December 2010:

- A. Defendant TERESA JANE STANDRIDGE would issue and cause to be issued direct deposits drawn on the New Foundations account at Wells Fargo Bank (formerly Wachovia Bank) to herself, and to Defendants TOMMY DALE STANDRIDGE, CATHY WHITLOCK LOWE,

VERONICA DALE WILLIAMS, WILLIAM LEE SIMMONS, and KRISTIE LYNN BROCK.

B. Defendant TERESA JANE STANDRIDGE would cause to be issued pay checks drawn on the New Foundations account at Wells Fargo Bank (formerly Wachovia Bank) to herself, and to Defendants CATHY WHITLOCK LOWE, VERONICA DALE WILLIAMS, WILLIAM LEE SIMMONS, and KRISTIE LYNN BROCK.

7. That during the time frame of this Indictment, the Defendants, TERESA JANE STANDRIDGE, TOMMY DALE STANDRIDGE, CATHY WHITLOCK LOWE, VERONICA DALE WILLIAMS, WILLIAM LEE SIMMONS, and KRISTIE LYNN BROCK, by the use of the scheme and artifice outlined above, did fraudulently and without authorization obtain approximately \$500,000.00, from Wells Fargo Bank (formerly Wachovia Bank).

All in violation of Title 18, United States Code, Sections 1344 and 2.

FORFEITURE

1. Upon conviction for violation of Title 18, United States Code, Section 1344, as charged in this Indictment, the Defendants, TERESA JANE STANDRIDGE, TOMMY DALE STANDRIDGE, CATHY WHITLOCK LOWE, VERONICA DALE WILLIAMS, WILLIAM LEE SIMMONS, and KRISTIE LYNN BROCK, shall forfeit to the United States their interest in:

2. **Property:**

Pursuant to Title 18, United States Code, Section, 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for offenses charged in this Indictment includes, but is not limited to, the following property:

(a) **Proceeds/Money Judgment:**

a sum of money equal to all proceeds the defendant obtained directly or indirectly as the result of the offenses charged in this Indictment, that is, a minimum of approximately \$ 557,965.50, in United States currency for which the Defendants are jointly and severally liable.

3. **Substitution of Assets:**

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants –

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third person;
- C. has been placed beyond the jurisdiction of the Court;
- D. has been substantially diminished in value; or
- E. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the said Defendants up to an amount equivalent to the value of the above-described forfeitable property;

Pursuant to Title 18 United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE Bill

redacted

FOREPERSON


WILLIAM N. NETTLES (MBC/jw)
UNITED STATES ATTORNEY